



CAMPAIGN  
FOR  
REAL ALE

**Campaign for Real Ale (CAMRA)  
Greater London Region**

Further Statement on Draft Further Alterations to the London Plan

Thank you for identifying whether public houses should specifically be mentioned in Policy 4.8Bc as a matter to be considered at EiP. As we observed in our March submission, the National Policy Planning Framework (NPPF) requires **all** planning authorities, including the Mayor, local authorities and the Planning Inspectorate, to give greater protection to public houses under P70. This is not optional.

The changes to the proposed paragraph 4.48A amendments suggested by the GLA in their 7 July schedule still fall short of the NPPF requirement: encouraging boroughs to think about whether or not **they** have a problem with pubs losses and, **if they do**, to bring in pub protection policies, remains inadequate.

Our evidence-based study, using comprehensive pub closure statistics, on which the report referenced at footnote 160 of FALP was based, demonstrates the scale of the problem. London has lost more than 2000 established public houses over the last 30 years. These are irreplaceable assets which represent the cultural and social evolution of the capital. Their loss has caused harm to London's micro-economies and the day to day needs of our neighbourhoods have been negatively impacted through the loss of community facilities. **That there are major threats to the sustainability of our pubs is beyond dispute.**

The GLA is right, however, in our view, to make the explicit connection with Policy 3.1b. Public houses are as much a part of London's 'social infrastructure' as meeting places, leisure and sports venues, cultural buildings and places of worship and, while it was only in relation to amendments to Section 4 that we could legitimately comment specifically on the strengthening of references to public houses, we would also express our support for:

- Policy 2.15: Town Centres, 'altered' subsection c2 regarding non-retail functions – including pubs, though not expressly;
- Policy 3.1: Ensuring Life Chances etc, (unaltered) subsection B – many pubs have facilities meeting the needs of particular groups and communities such as function rooms and meeting space used by a wide range of community organisations;
- Policy 3.16: Protection and Enhancement of Social Infrastructure, 'altered' subsection B – pubs form a key element of 'social infrastructure' and 'pubs,' might usefully have been added between 'recreation and sports and leisure facilities,' and 'places of worship' in line 6 of paragraph 3.86;
- Policy 7.1: Lifetime Neighbourhoods, the 'alterations' in subsection A (which refers to 7.4A) and 'altered' para 7.4A point 2 – pubs are 'places to spend time and to work, with a mix of accessible and adaptable uses' – and point 3 – pubs contribute to 'a cohesive community which features social interaction and social capital'.

Guidance note 5 might therefore suggest scope for consideration whether the specific mention of public houses that we had suggested for Policy 4.8Bc might alternatively or additionally belong, for example, in Policy 3.16, from the community rather than the retailer perspective.

We also welcome the GLA's recognition of the need specifically to mention Assets of Community Value (ACVs). Paragraph 2.20 of the Department for Communities and Local Government 'Community Right to Bid: Non-Statutory Advice note for Local Authorities' states:

*"The provisions do not place any restriction on what an owner can do with their property, once listed, so long as it remains in their ownership. This is because it is planning policy that determines permitted uses for particular sites. However the fact that the site is listed may affect planning decisions - it is open to the Local Planning Authority to decide whether listing as an asset of community value is a material consideration if an application for change of use is submitted, considering all the circumstances of the case."*

We believe that, realistically, the only way a local authority will feel confident in using ACV status as a reason for refusing a 'full' planning application will be if ACVs are explicitly referenced in an adopted 'sound' policy. With the Localism Act dating from only 2011, it is unlikely that those Councils with adopted and sound Local Plans will be able quickly to change policy wording to cater for ACVs. Reference to ACVs in a Policy within the London Plan might strengthen their resolve meanwhile.

Planning policy variously refers to 'valued' community assets. Our experience to date in London with the registration of 29 pubs as ACV leads us to regard registration as something of a token gesture. Only one of the 29 has been successfully bought out via the *community right to bid* provisions. Several others have had bids rejected. Often the degree of 'value' attributed to an asset is subjective. The reference to ACV registration at 160A in the suggested changes gives regional recognition and endorsement to CAMRA's national 'List your Local' campaign, which in itself has ministerial support. It is our desire to truly embed Localism into planning policy. This is a very positive step in that direction.